

City of Del Mar

1050 Camino Del Mar • Del Mar, California 92014-2698

BB

Where the Turt meet

June 5, 2001

California Resources Agency

Brian E. Baird

1416 Ninth Street, Suite 1311

Sacramento, CA 98514

(Transmitted electronically to shorepolicy@ceres.ca.gov 6/6/01)

Re: Draft Policy on Coastal Erosion Planning and Response

Dear Mr. Baird:

The City Council at their meeting of June 4, 2001 directed staff to inform you that the City of Del Mar supports the Draft Coastal Erosion Policy since it is in keeping with the Coastal Act standards. It was noted that the policy does not call for new regulations but more clearly urges "hazard avoidance" as the preferred alternative for dealing with coastal bluff erosion, and clearly identifies "armoring" as a last resort. Along with supporting the proposed policy, the City Council would like the Resources Agency to consider amending and strengthening the language to more clearly support the fact that natural erosion will continue on the coastal bluffs, and that hazard avoidance should mean acknowledging that timed retreat is ultimately the only solution.

Del Mar has long been a proponent of the Coastal Act standards, and in fact, Del Mar adopted the Beach Preservation Initiative (BPI) in 1988 that was designed to regulate the uses of the Del Mar beach area, which was considered a distinct and valuable natural resource [to be preserved] for the benefit of present and future generations. The issues in Del Mar are somewhat different from other coastal cities in that other cities have considerable development that is precariously perched on, or hanging over, the coastal bluffs, and in most cases in Del Mar, the rail road right-of-way is located between the coastal bluffs and private development on the bluffs. The BPI regulations identify a shoreline protection area (SPA line), seaward of which essentially no development can occur.

These City standards already require considerable substantiation of imminent danger before allowing any protective structures on the bluffs. Therefore, along with supporting the proposed policy, the City Council would like the Resources Agency to consider, and is recommending that the policy be amended and strengthened to more clearly address the fact that there is really no end in sight to the current natural coastal erosion and retreat process. The rate of increase in sea levels and the rate of coastal erosion and retreat appear, in fact, to be on the upswing.

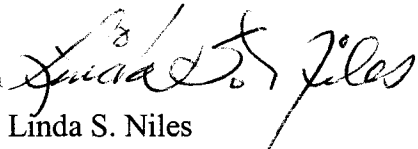
The Council would like you to focus on the fact that there is a true and imminent erosion problem on the California coast, which should not be ignored any longer. There is a real

need to add more definitive language to the policy at this time. Coastal erosion is most definitely on the upswing and the Del Mar Council is suggesting that language be added requiring 1) that the definition of "existing development" be clarified to mean only structures in place prior to implementation of the Coastal Act standards, or something in between then and now, 2) that there be a greater required setback for new development on the bluffs, such as 30 to 40', and 3) that there be a managed retreat program, so to speak, requiring that structures that have reached their useful economic life be removed and relocated, and not allowed to be remodeled if they are currently located within a certain number of feet from the coastal bluffs.

As a reminder, the City of Del Mar BPI standards adopted in 1988 already strengthen the Coastal Act Policies specific to the bluffs in Del Mar. The Del Mar City Council is hopeful that the Resources Agency will consider the ever continuing natural coastal erosion situation in revising the Draft Coastal Erosion Policy to add more restrictive language such as suggested herein.

Del Mar sincerely appreciates the opportunity to comment on such an important policy to the entire State of California and appreciates your efforts in protecting our natural resources on the California coast.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda S. Niles". The signature is fluid and cursive, with a large, stylized "L" and "N".

Linda S. Niles
Planning and Community Development Director

Cc: Honorable Mayor and City Council
City Manager, Lauraine Brekke-Esparza
Public Works Director, David Scherer
City Engineer, Powell/PBS&J